

# **EXHIBIT Q**

RAELEAN McGEE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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DARCY M. BLACK,

Plaintiff,

-vs-

BUFFALO MEAT SERVICE, INC., doing business  
as BOULEVARD BLACK ANGUS, also known as  
BLACK ANGUS MEATS, also known as  
BLACK ANGUS MEATS & SEAFOOD,  
ROBERT SEIBERT,  
DIANE SEIBERT,  
KEEGAN ROBERTS,

Defendants.

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Examination Before Trial of  
RAELEAN McGEE, taken pursuant to the Federal Rules of Civil  
Procedure, in the law offices of GRECO TRAPP, PLLC, 1700  
Rand Building, 14 Lafayette Square, Buffalo, New York,  
taken on May 20, 2019, commencing at 9:28 A.M., before  
MARY ANN MORETTA, Notary Public.

1       while working, in reference to a woman's breasts,  
2       your headlights are on, would you find that to be  
3       offensive?

4       A. Yes.

5       Q. If a male at Black Angus Meat referred to any  
6       female, she's got a nice ass, would that be  
7       offensive?

8       A. Yes.

9       Q. Would it ever be appropriate in the workplace?

10      A. No.

11      Q. Did you ever hear that -- from Darcy or anyone,  
12       that her children were referred to in an  
13       offensive term by anybody at Black Angus Meat?

14      A. No.

15      Q. Do you recall Darcy Black calling you the day she  
16       was fired, the day she left work?

17      A. I don't remember, no.

18      Q. Do you recall her contacting you on her way --  
19       actually, on her way as she left the building,  
20       and telling you that Jamie Lapress had referred  
21       to her children as niggers?

22      A. No, I don't remember that.

23      Q. Would it ever be appropriate -- well, first, have

1 A. If she knew, yes.

2 Q. But you have no recollection of Darcy calling  
3 you?

4 A. No.

5 Q. No recollection of her telling you how Jamie  
6 Lapress referred to her children?

7 A. No.

8 Q. Do you ever recall her telling you that Bob  
9 Seibert told her -- do you ever recall her  
10 telling you -- strike that.

11 Do you ever recall her describing an  
12 incident to you where, on or about May 15, 2010,  
13 Mr. Lapress needed a key for the paper towel  
14 holder by the sink in the deli? He asked Miss  
15 Black if she could break into it. When she said  
16 no, Mr. Lapress said you have two black kids, so  
17 you must know how. Miss Black told him that her  
18 children do not steal, they don't break into  
19 stuff. And she asked him why he would say that.  
20 He replied because they are niggers.

21 Did you ever learn that?

22 A. No.

23 Q. If you heard him say that to Darcy, would you be